

IN THE MATTER OF
Emanuel Delvalle dba Proficient Property Mgmt. LLC
DEBTOR

UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY

CHAPTER 11
CASE NO.17-30701 JKS

**Objection to PNC Mortgage Notice of
Motion For Relief From Stay**


To: US Bankruptcy Court
c/o Honorable John K Sherwood Staff
50 Walnut Street
Newark, NJ 07102

US Department Of Justice
c/o Daniel C. Kropiewnicki
One Newark Center Suite 2100
Newark, NJ 07102

Denise Carlon Esq.
KML Law Group P.C
216 Haddon Avenue Suite 406
Westmont, NJ 08108

2018 APR - 6 PM 2:09
FILED
NEWARK, NJ
U.S. BANKRUPTCY COURT

The debtor objects to Deutshe Bank Trust Company Americas, As Trustee for Residential Accredit Loans Inc Mortgage Asset Backed Pass Through Certificates Series 2005-AQ6, Motion for Relief From Stay. The debtor's objections are due to the gross negligence of The Passaic Valley Water Commission for dangerously increasing the water pressure at 169 North 4th Street in Paterson New Jersey 07522 without proper notice, has caused the debtor \$4,634.64 in liquid damages, caused the debtor, to be fined \$5,000.00 from the New Jersey Department of Community Affairs. The debtor was forced to not pay, PNC Bank, AKA Deutshe Bank Trust Company Americas, As Trustee for Residential Accredit Loans Inc Mortgage Asset Backed Pass Through Certificates Series 2005-AQ6, January 2018 Loss Mitigation payment. Due to the tenant at 291 Power Street Apt 2 in New Brunswick NJ breaking their lease which ended 8/31/2018 and causing \$3,192.23 in liquid damages to the debtor. The property in New Brunswick is a student rental market with high student demand for housing that begins in September of every year. The Debtor did not pay PNC Bank adequate protection for February 2018 or March 2018 because of the tenant damages to the property and the fact that the rental market is not at its prime time. The debtor has not missed a mortgage payment in over 10 years for this property. As a result, of the financial emergencies expenses, the debtor is delayed retaining an attorney to complete the debtor's reorganization plan.


Debtor: Emanuel Delvalle Date 4/5/18